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9 *Attorneys for Defendants*
 10 *Pisanelli Bice, PLLC, James P. Pisanelli,*
Debra L. Spinelli and Ava Schaefer

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13
 14 FRESH MIX, LLC,

15 Plaintiffs,
 vs.

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 17 PISANELLI BICE, PLLC, a Nevada Law Firm and
 Professional Limited Liability Company; JAMES
 P. PISANELLI, ESQUIRE, an individual; DEBRA
 L. SPINELLI, ESQUIRE, an individual; AVA
 SCHAEFER, ESQUIRE, an individual; COHEN
 DOWN QUIGLEY PC, an Arizona Law Firm and
 Professional Corporation; RONALD J. COHEN,
 an individual; BETSY LAMM, an individual;
 DANIEL QUIGLEY, an individual; JENNA
 BROWNLEE, an individual; BRUCE A LESLIE,
 CHTD., a Nevada Firm; BRUCE A. LESLIE, an
 individual; BROWNSTEIN HYATT FARBER
 SCHRECK LLP, a Colorado Limited Liability
 Partnership; SAMUEL A. SCHWARTZ, an
 individual, and SCHWARTZ LAW, PLLC; and
 ZACHARIAH LARSON, an individual; and
 LARSON & ZIRZOW, LLC.

18
 19 Defendants,

20 CASE NO.: 2:24-cv-00397-JCM-NJK

21 **STIPULATION AND PROPOSED**
ORDER EXTENDING TIME TO
FILE REPLY IN SUPPORT OF
MOTION TO DISMISS FRESH
MIX, LLC'S FIRST AMENDED
COMPLAINT PURSUANT TO
FED. R. CIV. P. 12(b)(6) (ECF NO.
34)

22
 23 **(First Request)**

Pursuant to Local Rules IA 6-1 and 6-2 and LR 7-1, IT IS HEREBY STIPULATED AND
1 AGREED between Plaintiff Fresh Mix, LLC (“Plaintiff”) and Defendants Pisanelli Bice, PLLC,
2 James J. Pisanelli, Debra L. Spinelli and Ava Schaefer (collectively, “PB Defendants” and,
3 together with Plaintiff, the “Parties”), by and through their undersigned counsel of record,
4 that the PB Defendants shall have an additional 7 days to file their reply in support of the
5 pending Motion to Dismiss Fresh Mix, LLC’s Amended Complaint Pursuant to Fed. R. Civ. P.
6 12(b)(6) (ECF No. 34) (the “Motion”). The PB Defendants’ original deadline to file their reply is
7 May 15, 2024. With an additional 7 days, the PB Defendants’ deadline to file their reply is
8 extended to May 22, 2024.

Good cause exists for the extension set forth herein. First, the PB Defendants require
11 additional time to prepare a reply in support of the Motion as the undersigned counsel is preparing
12 a dispositive motion with enlarged page limits that is due before the existing deadline in another
13 matter pending in Nevada state court. Additionally, the undersigned counsel is preparing for a
14 series of party-depositions that will occur next week in another matter pending in Nevada state
15 court.

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1 This is the first extension requested for Defendants to file their reply in support of the Motion
2 and is not made for the purpose of delay.

3 IT IS SO STIPULATED.

4 DATED this 14th day of May, 2024

5 CAMPBELL & WILLIAMS

6 By /s/ Philip R. Erwin

7 J. COLBY WILLIAMS, ESQ.
8 PHILIP R. ERWIN, ESQ.
9 SAMUEL R. MIRKOVICH, ESQ.

10 PISANELLI BICE

11 JAMES J. PISANELLI, ESQ.
12 TODD L. BICE, ESQ.
13 DEBRA L. SPINELLI, ESQ.
14 JORDAN T. SMITH, ESQ.

15 *Attorneys for Defendants*

16 *Pisanelli Bice, PLLC, James P. Pisanelli,
17 Debra L. Spinelli and Ava Schaefer*

18 DATED this 14th day of May, 2024

19 STERN & EISENBERG

20 By /s/ Steven K. Eisenberg

21 STEVEN EISENBERG, ESQ. (*pro hac vice*)

22 LAW OFFICE OF MATTHEW L. SHARP

23 MATTHEW L. SHARP

24 *Attorneys for Plaintiff
25 Fresh Mix, LLC*

26 **IT IS SO ORDERED.**

27 
28 UNITED STATES DISTRICT JUDGE

29 DATED: May 14, 2024

C A M P B E L L & W I L L I A M S
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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of May, 2024, I caused a true and correct copy of the foregoing Stipulation and Proposed Order Extending Time to File Reply in Support of Motion to Dismiss Fresh Mix, LLC's First Amended Complaint to be served via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/ Philip R. Erwin

An employee of Campbell & Williams

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